

### Remarks

The Applicants note with appreciation the withdrawal of the 35 U.S.C. §112 rejection as well as the 35 U.S.C. §102 rejection based on Haskell.

Claims 15-30 stand rejected under 35 U.S.C. §102 as being anticipated by Kalva. The Applicants note with appreciation the Examiner's detailed comments hypothetically applying Kalva to those rejected claims. The Applicants respectfully submit, however, that Kalva is inapplicable.

As noted above, the Examiner provided helpful comments with respect to the hypothetical applicability of Kalva to the rejected claims, as well as comments with respect to the Applicants' last Response. The Applicants respectfully submit that Kalva is inapplicable for the reasons previously noted in that earlier Response.

However, the Applicants have amended independent Claims 15 and 26 as a follow up on the previous Response and as a consequence of the Examiner's comments. In particular, both of those claims now recite that the BIFS node comprises at least a nature of action field and a parameter of action field applied to objects of a scene with the parameter of action field. Slightly different language is used in the respective claims inasmuch as Claim 15 is directed to the method, while Claim 26 is directed to an apparatus. The Applicants respectfully submit that Kalva fails to explicitly or implicitly disclose that claimed subject matter. Thus, Kalva does not disclose describing the actions to be performed under the claimed format, with every action including a nature of the action field and a parameter of the action field to form a BIFS node. Thus, one skilled in the art would not have been led to achieve such BIFS nodes from data user interaction defining actions to be applied to objects of scenes. The Applicants therefore respectfully submit that Kalva is inapplicable to all of Claims 15-30.

The Applicants respectfully submit that the above amendment does not raise new issues for consideration or require further searching. The amendments to Claims 15 and 26 address subject matter previously searched and considered and further directly address an issue helpfully raised by the Examiner in the extant Official Action. As a consequence, the Applicants respectfully request that the amendments to those claims be entered into the official file and considered on the merits. Also, the Applicants have not added any additional claims and, in any event, the amendments place the Application into better condition for appeal at a minimum.

The Applicants respectfully submit that the entire Application is now in condition for allowance, which is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'TDC', is written over the typed name.

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